

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

AGROVANA, LLC,

Plaintiff and Counterclaim-
Defendant,

v.

CONGO BRANDS LLC,

Defendant,

and

PRIME HYDRATION, LLC,

Defendant and Counterclaim-
Plaintiff.

Civil Action No. 1:24-cv-12400

**PLAINTIFF AND COUNTERCLAIM-DEFENDANT AGROVANA,
LLC'S MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION TO
COMPEL RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

EXHIBIT 12

Mar 19, 2024 00:00:00 AM - Mar 20, 2024 00:00:00 AM

iMessage Messages: 3, People: 2, Attachments: 0, Threads: 0



Hevan Patel (+19195612041) 10:33:07 AM

Hey Ryan/wyatt We need to discuss where we left off? Plan for 21 shipment(need to leave India this week) and rest of production plan as both manufacturers are waiting since 5 week now. We need to connect today! Most importantly payment stuff as well as no one from finance reached out to Tim.



Tim Panagopoulos (+16177190656) 12:43:56 PM

Hello everyone! What's a good time to get on a call and resolve all this today? It's long overdue

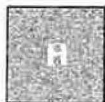


Tim Panagopoulos (+16177190656) 12:44:54 PM

We are assuming that the balance of product for 2024 and into Q1 of 2025 is a go

Mar 20, 2024 00:00:00 AM - Mar 21, 2024 00:00:00 AM

iMessage Messages: 5, People: 3, Attachments: 0, Threads: 0



Hevan Patel (+19195612041) 09:57:33 AM

Guys, We need answers on production schedules and warehouse shipments. Please understand our side of situation



Ryan Lane (+16185939867) 10:43:13 AM

Hey guys Wyatt and I are both back in the office today putting our heads together. We will call end of day!



Hevan Patel (+19195612041) 10:49:16 AM

Please do



Tim Panagopoulos (+16177190656) 06:53:30 PM

We're still waiting for this call today

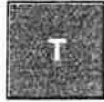


Tim Panagopoulos (+16177190656) 06:53:58 PM

This is priority 1 for us and we need to get resolved stat

Mar 27, 2024 00:00:00 AM - Mar 28, 2024 00:00:00 AM

iMessage Messages: 20, People: 2, Attachments: 0, Threads: 0



Tim Panagopoulos (+16177190656) 08:22:08 PM

Ryan? Wyatt?



Ryan lane congo LY (+16185939867) 08:32:18 PM

Yes squared away with Michael and he is working with team to find cheapest shipping option and destination



Tim Panagopoulos (+16177190656) 08:32:37 PM

Thank you



Tim Panagopoulos (+16177190656) 08:32:55 PM

Today was the day we were supposed to get the schedule for 2024 balance of PO's and Q1 of 2025



Ryan lane congo LY (+16185939867) 08:32:56 PM

Was working with Brad on our team to start getting the inventory on Vegas moved... we've got a warehouse that will store at under \$12.50 USD per pallet. What have you all been paying?



Ryan lane congo LY (+16185939867) 08:33:13 PM

Have another call on this still this evening... will have in a few hours



Tim Panagopoulos (+16177190656) 08:33:20 PM

Over 22



Tim Panagopoulos (+16177190656) 08:33:28 PM

Loved "Was working with Brad on our team to start getting..."



Tim Panagopoulos (+16177190656) 08:33:39 PM

Liked "Have another call on this still this evening... will..."



Tim Panagopoulos (+16177190656) 08:33:43 PM

Thank you



Ryan lane congo LY (+16185939867) 08:33:44 PM

Got the # crunchers finalizing a few calculations



Ryan lane congo LY (+16185939867) 08:34:11 PM

I need to get you all set up with some of our 3PL partners... your guys are ripping you off!



Tim Panagopoulos (+16177190656) 08:34:33 PM



Ryan lane congo LY (+16185939867) 08:36:10 PM

Probably Baze or Michael's fault right?



Tim Panagopoulos (+16177190656) 08:38:42 PM

No no



Tim Panagopoulos (+16177190656) 08:38:45 PM

Mine



Ryan lane congo LY (+16185939867) 08:40:31 PM

^ I was trying to give you someone else to blame



Tim Panagopoulos (+16177190656) 08:40:42 PM



Tim Panagopoulos (+16177190656) 08:41:15 PM

I know thank you, but I was taught that when I mess up, I own it



Tim Panagopoulos (+16177190656) 08:41:33 PM

I can't blame Michael and Baze ever because I love them both

Apr 9, 2024 00:00:00 AM - Apr 10, 2024 00:00:00 AM

iMessage Messages: 2, People: 1, Attachments: 0, Threads: 0



Tim Panagopoulos (+16177190656) 05:12:00 PM

Gents-please confirm the schedule for the balance of 2024/2025 CWP. We promised the confirmation to our teams by Wednesday EOD



Tim Panagopoulos (+16177190656) 05:12:07 PM

Thanks!! 🙏

Apr 15, 2024 00:00:00 AM - Apr 16, 2024 00:00:00 AM

IMessage Messages: 3, People: 2, Attachments: 0, Threads: 0





Tim Panagopoulos (+16177190656) 10:45:36 AM

Ryan-couple things. 1-plan approved thanks! 2-please send me the preferred vendor letter when you can 3-need resolution on the really past due invoices as per our emails on Friday with Levi Thanks! Tim




Ryan Lane (+16185939867) 12:17:07 PM

1. Confirmed, thank you  2. We have the letter from Legal. Wyatt and I needed to connect today and send you over a note with the letter... there is 1 of the 2 suppliers that Wyatt's team is seeing increased quality issues with and likely want to plan to reduce our volume with them. Want to make sure there is nothing in the letter if you all send to them that is to the contrary  3. I re-connected with Levi this morning and told them to get it fixed. Should be connecting with you today.



Tim Panagopoulos (+16177190656) 12:17:58 PM

Loved "1. Confirmed, thank you  2. We have the letter fr..."